

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:)
)
RAY A BOHANAN) **Case No. 13-15540-JDL**
TERESA A BOHANAN)
Debtors.) **Chapter 13**

**MOTION TO RETAIN TAX REFUND, BRIEF IN SUPPORT,
NOTICE OF OPPORTUNITY FOR HEARING,
AND COMBINED REQUEST FOR COMPENSATION**

COMES NOW Debtors Ray and Teresa Bohanan, and Moves the Court for an order allowing Debtors to retain their 2015 state and federal tax refunds and in support thereof states as follows:

1. On December 23, 2013, the Debtors filed a Petition under Chapter 13 of the Bankruptcy Code and on June 11, 2014 this Court entered its Order Confirming Plan. On October 8, 2015 this Court entered its Order Modifying Confirmed Plan.
2. Debtors will receive a federal refund in the amount of \$1,947.00 and a state refund in the amount of \$102.00.
3. The Debtor's air conditioner and heating unit together required four repairs during the past twelve months. Debtors estimate that they spent approximately \$700.00 during 2015 for these repairs. During the past month, Debtors heating unit quit working again and a repairman stated the unit could not be repaired and would cost approximately \$7,000.00 to \$10,000.00 for its replacement. Debtors believe they can secure a replacement for \$3,800.00 with assistance from their family.
4. To secure the replacement unit, Debtors will need to utilize all of their tax refunds to go towards the price and rely on their family for the remaining amount.

WHEREFORE, for the reasons stated above, Debtors respectfully requests that this Court enter an order allowing them to retain their federal and state income tax refunds for 2015 and to provide that counsel for Debtor receive \$250.00 for services rendered in this matter pursuant to the Guidelines and without the necessity of filing an application for the same.

Respectfully submitted,

/s Tearsa Storms Olson

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NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than twenty-one (21) days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided in Bankruptcy Rule 9006(f).